

Exhibit G

Movius, David

From: Movius, David
Sent: Friday, August 23, 2013 5:24 PM
To: 'Yanchar, Georgia'
Cc: 'McMullen, Dan'; 'John McLandrich (jmclandrich@mrllaw.com)'
Subject: RE: MRI v. Lynx - Source Code Protective Order

Georgia –

The additional restrictions set forth in MRI's proposed source code protective order are not acceptable to Lynx. As set forth in my June 14 email, access to the requested source code is both relevant and essential to a number of important issues in this case, including MRI's burden of proving ownership of the copyrights at issue and MRI's copying allegations. The restrictions MRI proposes, however, would completely hamstring Lynx's ability to meaningfully analyze the relevant source code and defend itself against MRI's claims.

While you have indicated that MRI is generally uncomfortable with producing its source code to Lynx, MRI has not identified good cause for modifying the existing protective order to include the new restrictions it proposes. The existing protective order is a blanket protective order that covers all materials produced in discovery and affords heightened protections to materials designated as "Attorneys' Eyes Only." When we negotiated the existing protective order, it was entirely foreseeable, if not inevitable, that discovery in this case would require production of source code between the parties, and Lynx relied on the negotiated protections in producing its own code to MRI. MRI therefore has not established that any modification to the existing stipulated protective order is warranted and Lynx renews its request for MRI to produce the source code as requested by Lynx in its discovery requests. If MRI disagrees, we can discuss this issue during our call next week.

Regards,

Dave

David T. Movius
Member

McDonald Hopkins

A business advisory and advocacy law firm®



T: 216.430.2029
F: 216.348.5474
dmovius@mcdonaldhopkins.com
businessadvocate.mcdonaldhopkins.com

600 Superior Avenue East
Suite 2100
Cleveland, OH 44114

Chicago • Cleveland • Columbus • Detroit • Miami • West Palm Beach

From: Yanchar, Georgia [<mailto:GYanchar@Calfree.com>]
Sent: Wednesday, July 24, 2013 3:59 PM
To: 'John McLandrich (jmclandrich@mrllaw.com)'; Movius, David
Cc: McMullen, Dan
Subject: MRI v. Lynx - Source Code Protective Order

John and Dave,

As we discussed, attached is a draft supplemental protective order to govern production of source code, which we propose to jointly move the Court to enter as an addendum to the existing protective order.

Regards,

Georgia

Georgia E. Yanchar

Attorney At Law

gyanchar@calfee.com

216.622.8233 **Phone**

216.241.0816 **Fax**

Calfee, Halter & Griswold LLP
The Calfee Building
1405 East Sixth Street
Cleveland, OH 44114-1607



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